

# Office of Environmental Health Hazard Assessment



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**MEMORANDUM**



Gray Davis  
Governor

**TO:** Charles M. Andrews, Chief  
Worker Health and Safety Branch  
Department of Pesticide Regulation  
P.O. Box 4015  
Sacramento, California 95812-4015

**FROM:** Anna M. Fan, Ph.D., Chief *AMF*  
Pesticide and Environmental Toxicology Section

**DATE:** May 28, 2003

**SUBJECT:** PROPOSED MANAGEMENT REDUCTION OPTIONS AND TARGET AIR  
CONCENTRATION VALUES FOR METHYLBROMIDE SUBCHRONIC  
EXPOSURE FIELD FUMIGATION REGULATIONS

The Office of Environmental Health Hazard Assessment (OEHHA) has received your electronic mail correspondence sent on May 7, 2003, requesting comments on the Department of Pesticide Regulation's (DPR) proposal to use a township cap management approach as a mitigation method for methyl bromide use. The method is intended to enforce DPR's subchronic exposure target air concentrations. At the April 9, 2003, Methyl Bromide Interagency Workgroup meeting, DPR announced that it had selected target air concentration values of 9 parts per billion (ppb) for the protection of the general public (including children) and 16 ppb for the protection of adult workers from subchronic exposure to methyl bromide used in field fumigation. Regardless of the management reduction option, it is critical to point out that the target air concentrations proposed by DPR are higher than those of 1 ppb for the general public (including children) and 2 ppb for adult workers as recommended by OEHHA. OEHHA's position is provided in the attached memorandum from Dr. Anna Fan to Chuck Andrews dated March 11, 2003. Accordingly, OEHHA recommends that DPR reexamine its proposed target concentrations for the methyl bromide field fumigation regulations.

Regarding the management reduction options, it seems like each of the other options has its own advantages and disadvantages determined by different interested parties. The selection is best decided with input from the most involved, affected, and concerned parties. However, no matter which option is selected, it should be enforceable, validated with empirical data, and periodically verified to confirm no occurrence of hot spots and assure compliance with the regulations. OEHHA feels that a system to monitor air concentration levels of methyl bromide should be part of the regulations to verify compliance with the selected target air concentrations.

California Environmental Protection Agency

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption.*



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Charles M. Andrews, Chief  
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Thank you for the opportunity to discuss the proposed management reduction options and the target concentrations for methyl bromide. If you have further questions, please call me at (510) 622-3165 or Mr. Robert Schlag at (916) 323-2624.

Attachment

cc: Val F. Siebal  
Chief Deputy Director  
Office of Environmental Health Hazard Assessment

George V. Alexeeff, Ph.D., D.A.B.T.  
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